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March 24, 2020

Via ECF

The Honorable Ronnie Abrams
United States District Court
For the Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: Thorne v. Boston Market Corporation, No. 1:19-cv-09932-RA
Request to Extend Defendant's Time to Respond to Complaint

Dear Judge Abrams:

We represent defendant Boston Market Corporation ("Defendant") in the above-referenced action. Pursuant to Rules 1(A) and 1(D) of Your Honor's Individual Rules and Practices, we write with the consent of counsel for plaintiff Braulio Thorne ("Plaintiff"), respectfully to request that the Court extend Defendant's time to file its Reply Memorandum of Law in support of its Motion to Dismiss from March 26, 2020 until April 16, 2020. This is Defendant's first request for an extension of time to file its Reply.

In support of this request, counsel for Defendant states that the current COVID-19 pandemic has created unforeseen delays and complications in its operations and that this extension, if granted, will permit counsel additional time to prepare Defendant's Reply Memorandum in support of its Motion to Dismiss. If granted, this extension will not affect any other dates scheduled in this action. As noted, Plaintiff's counsel consents to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

Attorney for Defendant

cc: All Counsel of Record (via ECF)

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.

March 25, 2020

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